

## **REMARKS**

Applicant respectfully requests reconsideration and allowance of the subject application. Claims 1-27 are pending, of which claims 1, 6, 15, and 19-26 have been amended. Support for the amendments can be found at least at page 18 lines 22-24 in the Specification.

### **35 U.S.C. §101 Claim Rejections**

Claims 22 and 23 are rejected under 35 U.S.C. §101 as being directed to non-statutory subject matter (*Office Action* p.3). Appropriate amendments have been provided herein, and Applicant requests that the §101 rejection be withdrawn.

### **35 U.S.C. §112 Claim Rejections**

Claims 1-27 are rejected under 35 U.S.C. §112, second paragraph, as being indefinite (*Office Action* p.3). The Office indicates that the term “synchronously” renders the claims indefinite and does not have a definition in the specification. Appropriate amendments have been provided herein and Applicant contends that support for the amendments can be found at least at page 18 lines 22-24 in the Specification. Accordingly, Applicant requests that the §112 rejection be withdrawn.

1                   **35 U.S.C. §103 Claim Rejections**

2           **A.**     Claims 1, 7-9, 14, 19-21, and 24-26 are rejected under  
3 35 U.S.C. §103(a) as being obvious over U.S. Patent No. 6,437,803 to  
4 Panasyuk et al. (hereinafter, "Panasyuk") in view of U.S. Patent No. 6,877,027 to  
5 Spencer et al. (hereinafter, "Spencer") (*Office Action* p.5). Applicant respectfully  
6 traverses the rejection.

7           **B.**     Claims 10-13 are rejected under 35 U.S.C. §103(a) as being obvious  
8 over Panasyuk in view of Spencer, and further in view of U.S. Patent No.  
9 5,491,780 to Fyles et al. (hereinafter, "Fyles") (*Office Action* p.8). Applicant  
10 respectfully traverses the rejection.

11           **C.**     Claims 2-6, 15, and 27 are rejected under 35 U.S.C. §103(a) as being  
12 obvious over Panasyuk in view of Spencer, and further in view of U.S. Patent No.  
13 6,304,895 to Schneider et al. (hereinafter, "Schneider") (*Office Action* p.10).  
14 Applicant respectfully traverses the rejection.

15           **D.**     Claims 16-18 are rejected under 35 U.S.C. §103(a) as being obvious  
16 over Panasyuk in view of Spencer and Schneider, and further in view of  
17 U.S. Patent No. 5,461,716 to Eagen et al. (hereinafter, "Eagen") (*Office Action*  
18 p.13). Applicant respectfully traverses the rejection.

19           **E.**     Claims 4 and 22-24 are rejected under 35 U.S.C. §103(a) as being  
20 obvious over Panasyuk in view of Spencer, and further in view of U.S. Patent No.  
21 5,682,486 to Grossman et al. (hereinafter, "Grossman") (*Office Action* p.16).  
22 Applicant respectfully traverses the rejection.

1        **Claim 1** recites a method, comprising:

2                gathering region data for displaying a region of a server  
3        desktop remotely on a client display, wherein the region data  
4        describe a shape and a position of the region;

5                gathering graphics data for the region, wherein the graphics  
6        data describe visual content of the region, and wherein the region  
7        data and the graphics data are gathered synchronously so as to  
8        maintain an association of the region data and the graphics data; and

9                sending the region data and the graphics data to a client while  
10        maintaining the association between the region data and the graphics  
11        data.

12        Panasyuk and/or Spencer do not teach or suggest gathering region data and  
13        graphics data where “the region data and the graphics data are gathered  
14        synchronously so as to maintain an association of the region data and the graphics  
15        data”, as recited in claim 1.

16        Panasyuk describes a system in which changes to a displayed window, in a  
17        system of multiple displays, are reflected in the corresponding windows displayed  
18        on a local or remote server or client (*Panasyuk* col.1, lines 50-58). However, there  
19        is no indication in Panasyuk that region data and graphics data are gathered  
20        synchronously so as to maintain an association of the region data and the graphics  
21        data, as recited in claim 1.

22        The Office cites to various sections of Panasyuk and contends that  
23        Panasyuk implicitly teaches “the synchronous limitation” (*Office Action* pp. 5-19).  
24        Applicant disagrees because Panasyuk describes a conventional system that is  
25        essentially described in the Background of the subject Application. For example,  
26        Applicant describes that the graphics data of a region is gathered and transmitted

1 to a client independently of the shape and position information (*Background* p.3,  
2 lines 4-6).

3 The Office cites Panasyuk for a system to incorporate windows from a  
4 remote desktop to a local desktop (*Panasyuk* col.2, lines 31-42; *Office Action* p.5).  
5 Panasyuk only describes that a local node and a remote node are connected by a  
6 communications link by which the nodes exchange desktop information and  
7 graphical information (*Panasyuk* col.2, lines 33 -40). However, there is no  
8 indication in this section of Panasyuk that region data and graphics data are  
9 gathered synchronously so as to maintain an association of the region data and the  
10 graphics data, as recited in claim 1.

11 Similarly, the Office cites to another section of Panasyuk which only  
12 describes that a server agent sends window information to a client agent that  
13 creates windows on a client node desktop with the same size/position as the server  
14 node windows (*Panasyuk* col.6, lines 58-67). Again, there is no indication in this  
15 section of Panasyuk that region data and graphics data are gathered synchronously  
16 so as to maintain an association of the region data and the graphics data, as recited  
17 in claim 1.

18 The Office also cites to Panasyuk col.4, lines 1-12 for “implicitly” teaching  
19 the synchronous limitation (*Office Action* p.6). Applicant respectfully disagrees  
20 that a command issued every time period (e.g., ‘x’ milliseconds) which directs a  
21 node agent to determine changes to an associated desktop environment suggests  
22 synchronization, and the Office states (*Office Action* p.6). Rather, Panasyuk (at  
23 col.3, line 60 to col.4, line 12) describes that two separate agents monitor changes  
24 to their respective associated desktop environment. Panasyuk illustrates and  
25

1 describes two separate server node agents 30 and 30', and a client node agent 40,  
2 each of which monitor changes to a separate desktop environment 24, 24', and 14,  
3 respectively (see Fig. 2). There is no indication in Panasyuk that any of the  
4 separate node agents gather region data and graphics data synchronously so as to  
5 maintain an association of the region data and the graphics data, as recited in  
6 claim 1.

7  
8 Additionally, the Office states that Spencer teaches "synchronization  
9 verification of multiple applications across remote systems" (*Office Action* p.7).  
10 Applicant does not disagree that Spencer may describe the synchronization of  
11 applications in different locations and across remote systems (*Spencer* col.2, line  
12 43 to col.3, line 2; col.4, line 59 to col.5, line 27). However, there is no indication  
13 in Spencer that region data and graphics data of a single desktop display are  
14 gathered synchronously so as to maintain an association of the region data and the  
15 graphics data, as recited in claim 1. Further, Spencer adds nothing more to the  
16 description in Panasyuk of obtaining data from two separate locations (*Panasyuk*  
17 col.3, line 60 to col.4, line 12, for example).

18 Still further, Spencer describes a system of synchronization verification,  
19 such as monitoring the number of windows that have been created by the multiple  
20 applications (*Spencer* col.5 lines 10-26). Spencer does not describe gathering two  
21 types of data (i.e., region data and graphics data) synchronously from a single  
22 server display so as to maintain an association of the region data and the graphics  
23 data, as recited in claim 1, but rather describes using feedback to check if the data  
24 received from different locations is still synchronized.  
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1  
2 Additionally, it follows that since neither Panasyuk and/or Spencer teach or  
3 suggest gathering the region data and the graphics data synchronously from a  
4 single server display so as to maintain an association of the region data and  
5 graphics data, then neither Panasyuk nor Spencer teaches or suggests sending the  
6 region data and the graphics data to a client while maintaining the association  
7 between the region data and the graphics data, as recited in claim 1.

8 Accordingly, claim 1 is allowable over the Panasyuk-Spencer combination  
9 for at least the many reasons described above and Applicant respectfully requests  
10 that the §103 rejection be withdrawn.

11  
12 **Claims 2-14** are allowable by virtue of their dependency upon allowable  
13 claim 1, and are allowable over Panasyuk and/or Spencer for at least the reasons  
14 described above in response to the rejection of claim 1. Additionally, claims 7-9  
15 and 14 may also be allowable over the Panasyuk-Spencer combination for  
16 independent reasons. For example:

17 Claim 7 recites that sending the data includes “forming a sequence of  
18 region data and graphics data, wherein the region data precedes the graphics data.”  
19 Panasyuk and/or Spencer do not describe sending region data and graphics data  
20 from a server to a client while maintaining the association between the region data  
21 and the graphics data (claim 1), and forming a sequence of region data and  
22 graphics data where the region data precedes the graphics data, as recited in  
23 claim 7.  
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1        Claims 2-6 are also allowable over the Panasyuk-Spencer-Schneider  
2 combination because Schneider does not address the deficiencies of Panasyuk  
3 and/or Spencer as described above in response to the rejection of claim 1.

4        Claim 4 is also allowable over the Panasyuk-Spencer-Grossman  
5 combination because Grossman does not address the deficiencies of Panasyuk  
6 and/or Spencer as described above in response to the rejection of claim 1.

7        Claims 10-13 are also allowable over the Panasyuk-Spencer-Fyles  
8 combination because Fyles does not address the deficiencies of Panasyuk and/or  
9 Spencer as described above in response to the rejection of claim 1.

10  
11        **Claim 15** recites a remoting synchronization engine, comprising:

12            a region data gathering module to gather region data  
13 describing a region of a display desktop of a server to be remotely  
14 displayed on a client, wherein the region data describe a shape and a  
desktop position of the region;

15            a graphics data gathering module to gather graphics data,  
16 wherein the graphics data describe a visual content of the region, and  
17 wherein the region data and the graphics data are gathered  
synchronously so as to maintain an association of the region data and  
the graphics data; and

18            a display driver at the server to collect the region data and the  
19 graphics data and to send the region data and the graphics data from  
20 the server to the client while maintaining the association between the  
region data and the graphics data.

21  
22        As described above in response to the rejection of claim 1, Panasyuk and/or  
23 Spencer do not teach or suggest gathering region data and graphics data where  
24 “the region data and the graphics data are gathered synchronously so as to  
25 maintain an association of the region data and the graphics data”, as recited in

1 claim 15. Further, Panasyuk and/or Spencer do not teach or suggest the region  
2 data and the graphics data being sent from the server to the client while  
3 maintaining the association between the region data and the graphics data, as  
4 recited in claim 15.

5 The Office recognizes that Panasyuk and Spencer fails to disclose that  
6 region data and graphics data are synchronously gathered in a single display  
7 driver, as recited in claim 15 (*Office Action* p.10). The Office cites to a device  
8 driver and control application in Schneider to collect screen data, which includes  
9 region and graphics data to be stored in the data structure of Spencer for  
10 synchronous transmission (*Office Action* p.10). Schneider describes that a device  
11 driver can be located either in a target controller, or can be integrated into a  
12 peripheral target device (*Schneider* col.6, lines 9-14, lines 58-62; Fig. 1A). In  
13 either case, the device driver in Schneider is not located at the server, as recited in  
14 claim 15, and clearly cannot send region data and graphics data from the server to  
15 the client while maintaining the association between the region data and the  
16 graphics data, as recited in claim 15.

17 Accordingly, claim 15 is allowable over the Panasyuk-Spencer-Schneider  
18 combination for at least these reasons, and Applicant respectfully requests that the  
19 §103 rejection be withdrawn.

20  
21 **Claims 16-18** are allowable by virtue of their dependency upon allowable  
22 claim 15, and are allowable over Panasyuk, Spencer, and/or Schneider for at least  
23 the reasons described above in response to the rejection of claim 15. Claims 16-18  
24 are also allowable over the Panasyuk-Spencer-Schneider-Eagen combination  
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1 because Eagen does not address the deficiencies of Panasyuk, Spencer, and/or  
2 Schneider as described above in response to the rejection of claim 15.

3  
4 **Claim 19** recites a synchronized data receiver, comprising:

5 a region subsystem to receive region data synchronized with  
6 graphics data from a server, the region data and the graphics data  
7 gathered synchronously from a server display so as to maintain an  
8 association of the region data and the graphics data, and the region  
subsystem to designate a region of a client display based on the  
region data; and

9 a graphics subsystem to receive the graphics data  
10 synchronized with the region data and to display graphics in the  
region based on the graphics data.

11  
12 As described above in response to the rejection of claim 1, Panasyuk and/or  
13 Spencer do not teach or suggest that region data and graphics data are gathered  
14 synchronously from a server display so as to maintain an association of the region  
15 data and the graphics data”, as recited in claim 19.

16 Accordingly, claim 19 is allowable over the Panasyuk-Spencer combination  
17 for at least this reason and Applicant respectfully requests that the §103 rejection  
18 be withdrawn.

1        **Claim 20** recites a synchronized remoting system, comprising:

2                a means for producing a visual content at a server to be  
3 remotely displayed on a client;

4                a means for designating a visual region of the visual content;

5                a means for gathering region data describing a geometry of  
6 the visual region;

7                a means for gathering graphics data describing the visual  
8 content in the visual region, wherein the graphics data is gathered  
9 synchronously with the region data so as to maintain an association  
10 of the region data and the graphics data; and

11               a means for sending the region data and the graphics data  
12 from the server to the client, wherein region data in synchronicity  
13 with particular graphics data precedes the particular graphics data.

14        As described above in response to the rejection of claim 1, Panasyuk and/or  
15 Spencer do not teach or suggest that graphics data is gathered synchronously with  
16 region data so as to maintain an association of the region data and the graphics  
17 data, as recited in claim 20. Further, Panasyuk and/or Spencer do not teach or  
18 suggest the region data and the graphics data being sent from the server to the  
19 client, as recited in claim 20.

20        Accordingly, claim 20 is allowable over the Panasyuk-Spencer combination  
21 for at least these reasons and Applicant respectfully requests that the §103  
22 rejection be withdrawn.

23        **Claim 21** is allowable by virtue of its dependency upon allowable claim 20.  
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1        **Claim 22** recites a method, comprising:

2                transmitting region data describing geometry of a visual  
3                region to be remotely displayed, wherein the region data recurs at  
              regular intervals in a data stream to update the geometry; and

4                transmitting graphics data describing visual content of the  
5                visual region, wherein the graphics data recurs at the regular  
6                intervals to update the visual content and wherein the region data of  
              each regular interval precedes the graphics data of the corresponding  
7                regular interval in the data stream.

8  
9                Panasyuk, Spencer, and/or Grossman do not teach or suggest transmitting  
10              region data and transmitting graphics data where the graphics data recurs at the  
11              regular intervals to update the visual content and where the region data of each  
12              regular interval precedes the graphics data of the corresponding regular interval in  
13              the data stream, as recited in claim 22.

14              Panasyuk describes communicating using industry standard communication  
15              protocols (*Panasyuk* col.3, lines 1-4), but makes no mention about transmitting  
16              region data, as described in claim 22. Spencer describes a method for maintaining  
17              synchronization in low bandwidth conditions (*Spencer* col.4, line 59 to col.5,  
18              line 27), but says nothing about transmitting region data, as described in claim 22.  
19              Grossman describes the movement of window or icons in a transport region from  
20              one monitor to another, but also says nothing about transmitting region data, as  
21              described in claim 22.

22              Accordingly, claim 22 is allowable over the Panasyuk-Spencer-Grossman  
23              combination for at least the reasons described above and Applicant respectfully  
24              requests that the §103 rejection be withdrawn.  
25

1        **Claim 23** is allowable by virtue of its dependency upon allowable claim 22.  
2        Claim 23 is also allowable over the Panasyuk-Spencer-Grossman combination for  
3        the reasons described above in response to the rejection of claim 1. Panasyuk  
4        and/or Spencer do not teach or suggest that region data and graphics data are  
5        gathered synchronously so as to maintain an association of the region data and the  
6        graphics data, as recited in claim 23. Grossman does not address the deficiencies  
7        of the Panasyuk-Spencer combination, and has not been cited by the Office as  
8        disclosing such. Accordingly, claim 23 is independently allowable.

9  
10       **Claim 24** recites a method, comprising “gathering region data and graphics  
11       data synchronously so as to maintain an association of the region data and the  
12       graphics data from a visual region of a computing server display to be remotely  
13       displayed on a client display”.

14       As described above in response to the rejection of claim 1, Panasyuk and/or  
15       Spencer do not teach or suggest gathering region data and graphics data  
16       synchronously so as to maintain an association of the region data and the graphics  
17       data, as recited in claim 24. Further, claim 24 is allowable over the Panasyuk-  
18       Spencer-Grossman combination because Grossman does not address the  
19       deficiencies of Panasyuk and/or Spencer as described above in response to the  
20       rejection of claim 1.

21       Accordingly, claim 24 is allowable over the Panasyuk-Spencer-Grossman  
22       combination for at least these reasons and Applicant respectfully requests that the  
23       §103 rejection be withdrawn.  
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**Claim 25** recites:

gathering region data for displaying a visual region of a server desktop remotely on a client display, wherein the region data describe a shape and a position of the region;

gathering graphics data for the visual region, wherein the graphics data describe a visual content of the visual region, and wherein the region data and the graphics data are gathered synchronously so as to maintain an association of the region data and the graphics data; ...

As described above in response to the rejection of claim 1, Panasyuk and/or Spencer do not teach or suggest that region data and graphics data are gathered synchronously so as to maintain an association of the region data and the graphics data, as recited in claim 25.

Accordingly, claim 25 is allowable over the Panasyuk-Spencer combination for at least this reason and Applicant respectfully requests that the §103 rejection be withdrawn.

**Claims 26-27** are allowable by virtue of their dependency upon allowable claim 25, and are allowable over Panasyuk and/or Spencer for at least the reasons described above in response to the rejection of claim 25. Claim 27 is also allowable over the Panasyuk-Spencer-Schneider combination because Schneider does not address the deficiencies of Panasyuk and/or Spencer as described above in response to the rejection of claim 25.

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